

1 Anna Y. Park, SBN 164242  
anna.park@eeoc.gov  
2 Nakkisa Akhavan, SBN 236260  
nakkisa.akhavan@eeoc.gov  
3 Andrea E. Ringer, SBN 307315  
andrea.ringer@eeoc.gov  
4 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
5 255 East Temple Street, Fourth Floor  
6 Los Angeles, CA 90012  
7 Telephone: (213) 785-3080  
8 Facsimile: (213) 894-1301  
9

10 Sophie Tarazi, CA SBN 329721  
Sophia.tarazi@eeoc.gov  
11 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
12 550 W. C Street, Suite 750  
13 San Diego, CA 92101  
14 Telephone: (619) 900-1910

15 Attorneys for Plaintiff  
16 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
17

18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

21 Plaintiff,

22 vs.  
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24 MEATHEAD MOVERS, INC., and  
DOES 1-10, inclusive,  
25

26 Defendants.  
27  
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Case No.: 2:23-cv-08177-DSF-AGR<sub>x</sub>

**DECLARATION OF EEOC  
ATTORNEY ANDREA RINGER IN  
SUPPORT OF PLAINTIFF EEOC'S  
MOTION TO STRIKE DEFENDANT  
MEATHEAD MOVERS, INC.'S  
AFFIRMATIVE DEFENSES**

Hon. Dale S. Fischer

Hearing Date: April 14, 2025

Time: 1:30 p.m.

Trial: August 18, 2026

**DECLARATION OF EEOC ATTORNEY ANDREA RINGER**

I, Andrea Ringer, am an Assistant Regional Attorney in the Los Angeles District Office of the United States Equal Employment Opportunity Commission (the “EEOC” or “Commission”) and represent the Commission in the above-captioned matter. I have personal knowledge of the facts set forth in this Declaration. I am competent to attest to these facts and would do so if called to testify.

1. The EEOC conducted an administrative investigation of Meathead’s compliance with the ADEA as part of its investigation of Directed Charge No. 485-2018-00078.


2. The Charge alerted Meathead that the EEOC’s focus would be on Meathead’s compliance with the ADEA and its hiring practices companywide.

3. The EEOC’s administrative investigation included, but is not limited to, the following:

- a. Issuing at least three Requests for Information to Meathead seeking information regarding Meathead’s hiring and recruitment policies, forms, and trainings, employee lists, job postings, marketing materials, and employment applications;
- b. Interviewing the Chief Executive Officer, the Chief Financial Officer, the Chief Operating Officer, and the General Manager at Meathead;
- c. Reviewing Meathead’s Position Statement and other representations from Meathead regarding its hiring and recruitment practices and decisions;
- d. Reviewing Meathead’s employee list and thousands of applicant records and interview notes;
- e. Reviewing other documents produced by Meathead, including but not limited to, Meathead’s hiring and recruitment policies and forms,

- 1 employee lists, job postings, marketing materials, employment  
2 applications, interview notes, and employee handbook;  
3 f. Sending questionnaires to thousands of applicants requesting  
4 information regarding their experience applying at Meathead and their  
5 age at the time, and reviewing hundreds of responses;  
6 g. Interviewing applicants regarding their experience applying at  
7 Meathead and their age at the time.

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9 Dated: March 12, 2025

  
10 Andrea Ringer  
11 Andrea Ringer  
12 EEOC Attorney  
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